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4 June 2021

Via CM-ECF

Honorable Brian M. Cogan  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Mikucka v. CVS Pharmacy, Inc.*, 21-CV-00951-BMC  
Extension of Deadline to Complete Fact Discovery

Dear Judge Cogan:

My office represents plaintiff Bozena Mikucka (“Mikucka”) in the captioned matter. Please accept this joint letter, pursuant to your Honor’s Individual Practices Rule 1.E, seeking a one-week extension to complete fact discovery from 10 June to 17 June 2021. This is the first request for an extension in this case.

The parties have completed most of fact discovery, having held three depositions and extensive paper (medical and non-medical) discovery. All that remains are the CVS defendants’ responses to Mikucka’s post-deposition demands. Likewise, the parties have proceeded into expert discovery by completing Mikucka’s medical examination and have set a site inspection for 9 June 2021.

The parties are prepared to conference this matter if necessary. Thank you.

Respectfully submitted,

Wiese & Aydiner, PLLC

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cc: Via CM-ECF

Melissa Manna, Esq.  
Counsel for defendants